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GT NEXUS, INC. Counter-Defendants CROWLEY  
MARITIME CORPORATION, CROWLEY LINER  
SERVICES, INDEPENDENT CONTAINER LINE,  
LTD., SEABORD MARINE, LTD., INC., and  
TURKON LINES AMERICA, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

GT NEXUS, INC., a Delaware corporation,  
Plaintiff,

v.

INTTRA, INC., a Delaware corporation,  
Defendant,

and

INTTRA, INC., a Delaware corporation,  
Counter-Plaintiff,

v.

GT NEXUS, INC., a Delaware corporation,  
CROWLEY MARITIME CORPORATION, a  
Delaware corporation, CROWLEY LINER  
SERVICES, INC., a Delaware corporation,  
INDEPENDENT CONTAINER LINE, LTD.,  
a Bahamas corporation, SEABOARD MARINE,  
LTD., INC., a Liberian corporation, SEA STAR  
LINE, LLC, a Delaware corporation, TURKON  
LINES AMERICA, INC., a Turkish corporation,  
BACARDI-MARTINI PRODUCTION, a French  
corporation,

Counter-Defendants.

Case No. 4:11-cv-02145-SBA

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO STAY  
PROCEEDINGS PENDING  
OUTCOME OF *EX PARTE*  
REEXAMINATION REQUESTS OF  
THE PATENTS-IN-SUIT**

1       **Whereas**, on February 1, 2012, Plaintiff /Counter-Defendant GT Nexus, Inc. (“GT Nexus”)   
2 filed with the U.S. Patent and Trademark Office requests for *ex parte* reexamination of all four   
3 patents-in-suit: U.S. Patent Nos. 7,761,387 (Reexam Control No. 90/012,119); 7,752,142 (Reexam   
4 Control No. 90/012,121); 7,827,119 (Reexam Control No. 90/012,122); and 7,756,794 (Reexam   
5 Control No. 90/012,120);

6       **Whereas**, counsel for all named parties have met and conferred regarding the status of this   
7 case and agree that a stay of the current litigation is appropriate;<sup>1</sup>

8       **Whereas**, the parties stipulate that the current litigation should be stayed and all hearings and   
9 deadlines in this matter to be taken off calendar until each of the aforementioned *ex parte*   
10 reexamination requests are resolved and there has been final exhaustion of any *ex parte*   
11 reexamination proceedings, including any appeals, of the patents-in-suit that result from the   
12 aforementioned requests;

13       **Whereas**, this case is in its early stages and the requested stay would not impact the case   
14 schedule: the Court has not yet conducted an initial Case Management Conference (the first one is   
15 scheduled for February 23, 2012), no trial date or other Court deadlines have been set, discovery has   
16 not yet commenced, and the only matter noticed for hearing (Counter-Defendant Bacardi-Martini   
17 Production’s Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. No. 53)) has not been fully   
18 briefed and is not scheduled to be heard by this Court until May 1, 2012;

19       **Whereas**, the requested stay would further interests of judicial economy and conservation of   
20 the parties’ and the Court’s resources;

21       **Whereas**, in consideration of the foregoing factors, the parties respectfully request that all   
22 proceedings before this Court in Case No. 11-02145 SBA be stayed until each of the aforementioned   
23 *ex parte* reexamination requests are resolved and any *ex parte* reexamination proceedings, including   
24 any appeals, of the patents-in-suit that result from any of the requests are complete;

25   
26 \_\_\_\_\_   
27 <sup>1</sup> While the case should be stayed as to all parties, Bacardi Martini Production has appeared in this   
28 case only for the special purpose of moving to dismiss for lack of personal jurisdiction (*see* Dkt.   
No. 53).

1        *Now, therefore, it is hereby stipulated and agreed* by and between all parties through their  
2        respective counsel, subject to the approval of the Court, that all proceedings before this Court in  
3        Case No. 11-02145 SBA be stayed until each of the aforementioned *ex parte* reexamination requests  
4        are resolved and any *ex parte* reexamination proceedings, including any appeals, of the patents-in-  
5        suit that result from any of the requests are complete.

6  
7        DATED: February 15, 2012

Respectfully submitted,

8        WILSON SONSINI GOODRICH & ROSATI

9  
10        By /s/ Stefani E. Shanberg

Stefani E. Shanberg

11        Attorneys for Plaintiff and Counter-Defendant  
12        GT NEXUS, INC.

13        DATED: February 15, 2012

MORGAN, LEWIS & BOCKIUS LLP

14        By /s/ Michael J. Lyons

15        Michael J. Lyons

16        Attorneys for Defendant and Counter-Plaintiff  
17        INTTRA, INC.

18  
19        PURSUANT TO STIPULATION, IT IS SO ORDERED

20  
21        Dated: \_\_\_\_\_, 2012

22        The Honorable Sandra B. Armstrong  
23        UNITED STATES DISTRICT JUDGE

1 Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Michael J. Lyons,  
2 attest that concurrence in the filing of this document has been obtained from each of the other  
3 signatories. I declare under penalty of perjury under the laws of the United States of America that  
4 the foregoing is true and correct. Executed this 15th day of February, 2012, at Palo Alto, California.

5  
6 /s/ Michael J. Lyons  
7 Michael J. Lyons  
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